

SAN DIEGO CITY EMPLOYEES' RETIREMENT SYSTEM
CONFLICT OF INTEREST CODE

APPENDIX A
Designated Positions

<u>Position</u>	<u>Duties</u>	<u>Category</u>
<u>President and Members of the Retirement Board</u>	Members of the Retirement Board who exercise responsibility for the management of public investments.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Retirement Administrator</u>	Under policy direction of the Retirement Board, manages the routine affairs of Retirement Office and staff; counsels and informs employees regarding options and benefits; has primary responsibility to deal with actuaries, provides assistance and recommendations to Board and its committees.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Assistant Retirement Administrator</u>	Assists the Retirement Administrator in performance of duties and acts on behalf of Retirement Administrator when necessary.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Investment Officer</u>	Under the direction of the Retirement Administrator, prepares recommendations regarding investment policy, practices, allocations and instruments; coordinates and participates in the review, selection, evaluation and termination of investment managers; negotiates contracts for investment managers and other investment related activities.	Form 700 (Statutory Requirement - Gov't Code § 87200)

<u>Assistant Investment Officer</u>	Advises or makes recommendations to the Investment Officer, Retirement Administrator, and the Board by conducting research or an investigation, preparing or presenting a report and/or analysis. Shares select responsibilities with Investment Officer and fulfills all responsibilities of Investment Officer in his/her absence.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>General Counsel</u>	Provides legal representation, advice, and recommendations to the Board and staff. Directs and reviews the work of the Retirement System's Legal Division.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Assistant General Counsel</u>	Assists the General Counsel in performance of duties and acts on behalf of the General Counsel when necessary.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Associate Counsel</u>	Under the direction of the General and Assistant General Counsel, provides legal representation, advice, and recommendations to the Board and staff.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Program Coordinator (Training & Marketing Division Manager) (Financial & Technical Division Manager) (Operations Division Manager)</u>	Conducts all necessary internal audits, administers SDCERS' operational budget and provides internal information technology services. Creates and maintains procedures for all tasks associated with benefit administration, including staff training.	Form 700 (Statutory Requirement - Gov't Code § 87200)
<u>Medical Review Officer</u>	Reviews disability applications for compliance with medical and administrative requirements. Advises or makes recommendations to the Retirement Administrator, Program Coordinator, and the Board regarding eligibility for disability requirements by preparing or presenting reports and analysis.	Form 700 (Statutory Requirement - Gov't Code § 87200)

<u>Senior Legal Retirement Assistant</u>	Advises or makes recommendations to the General Counsel, Assistant General Counsel, Associate Counsel, and Board by performing research, participation in the formulation or administration of Board policies and programs and preparing and presenting reports and/or analysis.	1
<u>Retirement Legal Assistant</u>	Advises or makes recommendations to the General Counsel, Assistant General Counsel, Associate Counsel, and Board by participating in the formulation or administration of Board policies and programs and preparing or presenting reports and/or analysis.	1
<u>Consultant</u>	Provides advice to the Board concerning the establishment and amendment of the Board's Investment Guidelines. Assists the Board in reviewing the activities of the System's investment manages and individual transactions relative to compliance with the City Charter and the Board's Investment Guidelines.	1
<u>Investment Manager</u>	Exercises discretionary authority over those funds or accounts designated to be under his or her supervision. Directs investments in those accounts without prior consultation with the Board or Staff. Initiates, negotiates and completes purchases and sales of securities and properties within the portfolio(s) under his or her supervision. Makes decisions and recommendations within the Board's Investment Guidelines and City Charter.	1

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APPENDIX B Disclosure Categories

- Category 1: Investments and business positions in any business entity that supplies goods or services to the Retirement System, and in any security which was or is held by any fund administered by Board of Administration wherein the reporting party's interest in said security amounts to one percent (1%) or more of the issue of that security.
- Income and gifts from any person or business entity that supplies goods or services to the Retirement System.
- Interests in real property.
- For the purposes of this Appendix, "goods or services" means goods or services supplied by any actuarial, accounting, banking, financial, investment or consulting firm.
- For the purposes of this Appendix, an interest in real property is any property located in or within two miles of the City of San Diego or within two miles of any land owned by the Retirement System as set forth in the Attachment to this Appendix which lists the real properties owned by the Retirement System in its Direct and Co-investment Real Estate Portfolio. A copy of this attachment is also on file in the Retirement Office.

SDCERS' DIRECT EQUITY PORTFOLIO HOLDINGS AS OF 1/2005

MANAGER	PROPERTY NAME	PROPERTY TYPE	PROPERTY/ PORT. VALUE (market value or gross real estate assets)	OWNERSHIP INTEREST	YEAR ACQUIRED
SSR Realty Advisors	Windsor Common Apartments 2800 Ashfield Drive Woodlawn, MD 21244	Multi-Family 286 units; 309,208 Sq. Feet	\$38,500,000	100%	2001
RREEF	Airport 100 Industrial, Inc. 1020 Airport 100 Way Hanover, Anne Arundel County, MD 21076	Industrial 321,600 Sq. Feet	\$20,100,000	100%	2001
RREEF	Barton Creek Office Buildings II & III 3801-3815 Capital of Texas Hwy S. Austin, TX 78704	Office 129,274 Sq. Feet	\$16,800,000	50%	2000
RREEF	Chelmsford Office Bldg 100 Apollo Drive Chelmsford, MA 01824	Office 110,779 Sq. Feet	\$13,800,000	100%	2000
RREEF	Eagan Town Center Eagan, MN	Retail 154,341 Sq. Feet	\$19,300,000	100%	2000
RREEF	Foothills Corporate Center 14415 South 50 th Street, Suite 150 Phoenix, AZ 85004	Office/Industrial 110,630 Sq Feet	\$12,900,000	100%	1999
RREEF	Fremont Business Center 5640 Stewart Avenue Fremont, CA 94538	Office/Industrial 192,397 Sq. Feet	\$20,410,000	100%	1999
RREEF	Latitudes at the Moors 6200 Northwest 173 Street Miami, FL 33015	Multi-Family 358 Units	\$25,400,000	100%	2000
RREEF	Towers Industrial Park 455 S, 6 th Avenue City of Industry, CA	Industrial 524,720 Sq. Feet	\$36,800,000	100%	2001
RREEF	Windsor Commons Northeast Quadrant of J. Turner Butler Boulevard and Hodges Road Jacksonville, FL	Retail 76,611 Sq. Feet	\$12,400,000	100%	2000
US Realty Advisors	Four Allegheny Center 200 Lancaster Avenue Wayne, Pennsylvania 19087-4046	Office 231,426 Sq. Feet	\$22,400,000	33.33%	1996
US Realty Advisors	Ingram Micro Inc. 1759 Wehrle Drive Amherst, New York 14221-7887 395 Youngs Road Amherst, New York 14221-5831	Office 200,075 Sq. Feet	\$22,250,000	33.33%	1998

MANAGER	PROPERTY NAME	PROPERTY TYPE	PROPERTY/ PORT. VALUE (market value or gross real estate assets)	OWNERSHIP INTEREST	YEAR ACQUIRED
US Realty Advisors	Mellon Financial Bldg. 2100 N. Central Road Fort Lee, NJ 07024-7558	Office 140,000 Sq. Feet	\$30,000,000	33.33%	2000
INVESCO	Caballero Industrial 6270-6290 Caballero Blvd. Buena Park, CA 90620	Industrial 130,000 Sq. Ft.	\$13,720,000	100%	2004
INVESCO	Super Stop N Shop Plaza 278 Washington Street Stoughton, MA 02072	Retail 74,739 Sq. Ft.	\$9,300,000	100%	2004